IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA :

v. : CRIMINAL NO. 23-16

BHASKAR SAVANI, :

a/k/a "Dr. B,"

ARUN SAVANI :

NIRANJAN SAVANI,

a/k/a "Nin," :

SUNIL PHILIP,

a/k/a "A. Philipose," :

AMEN DHYLLON,

a/k/a "Dr. Amen, :

ALEKSANDRA ROMADIAK,

a/k/a "Ola," :

JON JULIAN

VIVEK SAVANI :

BHARATKUMAR PARSANA,

a/k/a "Kumar," :

HITESH GOYANI

PIYUSHA PATEL :

SUSAN MALPARTIDA

AMENDED NOTICE OF LIS PENDENS

NOTICE IS HEREBY GIVEN that the above-captioned criminal case has been commenced by filing of an Indictment and is now pending in the United States District Court for the Eastern District of Pennsylvania.

In the pending criminal proceeding there is probable cause to believe that the real property described below and commonly known as **1500 Horizon Drive**, **Chalfont Pa 18914**, **Parcel No. 26-005-047-006-0B1 Batch 781779**, would in the event of conviction, be subject to forfeiture pursuant to 18 U.S.C. § 1963.

The name of the person(s) whose interest is intended to be affected is **Bhaskar** Savani, Arun Savani, and Niranjan Savani.

The property to be forfeited by reason of the foregoing, and to which this Lis

Pendens refers, is recorded at the Bucks County Recorder of Deeds, **Parcel No. 26-005-047-006-0B1 Batch 781779**, as owned by Arun Savani and Apexa Savani, husband and wife, Bhaskar Savani and Daksha Savani, husband and wife, Niranjan Savani and Rekha Savani, husband and wife, and is further described as follows:

ALL THAT CERTAIN unit in the property known, named and identified as Highpoint Square Condominium, Situate in New Britain Township, Bucks County, Pennsylvania, which has heretofore been submitted to the provisions of the Uniform Condominium Act by the recording in the Recorder of Deeds Office of Bucks County of a Declaration of a Condominium, dated 6-12-2000 and recorded in Land Record Book 2076 page 957, First Amendment thereto in Land Record Book 2254 page 1333, Second Amendment thereto in Land Record Book 2319 page 1072 and the plats and plans attached thereto as exhibits.

BEING designated there as Unit B-1

TOGETHER with a proportionate undivided interest of, in and to the Common Elements as more fully set forth in the aforesaid Declaration and any amendments thereto.

BEING CPN 26-005-047-006-0B1 Batch 781779

THE GRANTEE, for and on behalf of the grantee and grantee's heirs, personal representative, successors and assigns, by the acceptance of this Deed, covenants and agrees to pay such charges for maintenance of, repairs, to, replacement of and other expenses in connection with the Common Elements and any Limited Common Elements appurtenant to said Unit, as may be assessed against him, them or said Unit from time to time by the Executive Board in accordance with the Uniform Condominium Act of Pennsylvania and further covenants and agrees that the Unit conveyed by this Deed shall be subject to a lien for all amounts so assessed except in so far as Section 3407 (c) Of said Uniform Condominium Act of the Declaration may relieve a subsequent Unit owner of Liability for prior unpaid assessments. This covenant shall run with and bind the Unit hereby and all subsequent owners thereof.

BEING part the same premises which Pennmark Management Company Inc., Trustee for The Forevergreen Trust, by Deed dated 6-12-2000 and recorded in the Bucks County in Land Record Book 2076, page 951, conveyed unto Highpoint Square L.P., a Pennsylvania Limited Partnership, in fee.

TOGETHER with all and singular the buildings and improvements, ways, streets, alleys, passages, waters, water-courses, rights, liberties, privileges, hereditaments, and appurtenances, whatsoever thereunto belonging, or in any wise appertaining, and the reversions and remainders, rents, issues, and profits thereof; and all the estate, right, title, interest, property, claim and demand whatsoever of it in law as in equity, or otherwise howsoever, of, in, and to the same and every part thereof.

TO HAVE AND TO HOLD the said buildings and improvements hereditaments and premises hereby granted, or mentioned and intended so to be, with the appurtenances, unto the said

Grantee(s), their heirs and assigns, to and for the only proper use and behoof of the said Grantee(s), their heirs and assigns forever as

AND the said Grantor(s), their heirs and assigns does by these presents, covenant, grant and agree, to and with the said Grantee(s) their heirs and Assigns, that it the said Grantor all and singular and hereditaments and premises herein above described and granted, or mentioned, and intended so to be, with the appurtenances, unto the said Grantee(s) their heirs and Assigns, against it the said Grantor, its successors and assigns and against all and every person or persons whomsoever lawfully claiming or to claiming or to claim the same or any part thereof, by, from or under him, her, them or any of them, shall and will

WARRANT and forever DEFEND

ALL THAT VERTAIN lot or piece of ground, Situate in the Township of New Britain, County of Bucks and Commonwealth of Pennsylvania, bounded and described according to a Plan of Survey prepared for Highpoint Square (High Point Office Campus - Lot #4), prepared by Urwiler & Walter Inc., dated 9-3-1998 and revised 4-12-2000, as follows, to wit:

BEGINNING at a point on the Northeasterly side line of Horizon Road (60 feet wide), said point being located the following three courses and distances from the terminus of an arc of a circle having radius of 25.00 feet, connecting said sideline with the Northeasterly ultimate right of way line of County Line Road: (1) along said sideline of Horizon Road, North 36 degrees 32 minutes 22 seconds East 45.65 feet to a point of curvature; (2) along the same extending along the arc of a circle curving to the right having a radius of 220.00 feet, the arc distance of 118.68 feet to a point of tangency; (3) along the same, North 67 degrees 26 minutes 52 seconds East, 99.92 feet to a place of beginning; thence extending along the sideline of Horizon Road, the following 4 distances: (1) North 67 degrees 26 minutes 52 seconds East, 62.73 feet to a point of curvature; (2) extending along the arc of a circle curving to the left having a radius of 2,030 feet, the arc distance of 116.00 feet to a point of reverse curvature; (3) extending along the arc of a circle to the right having a radius of 270.00 feet, the arc distance of 299.43 feet to a point of tangency; (4) South 52 degrees 17 minutes 09 seconds East, 207.73 feet to a point; thence extending along Lot 7, South 35 degrees 49 minutes 45 seconds West, 288.72 feet to a point in line of Lot #6; thence extending along said lot and along Lot #5, North 54 degrees 10 minutes 15 seconds West, 544.98 feet to the point and place of beginning.

CONTAINING 3.000 acres of land, more or less.

BEING Lot No. 4 on said Plan.

BEING parcel Number 26-005-047-006-0B1 Batch 781779.

BEING the same premises which Sutow Realty Associates, a Pennsylvania Limited Partnership, By Deed dated 8-21-1998 and recorded 8-25-1988 in Bucks County, Pennsylvania in Land Record Book 1657 page 89, granted unto The Forevergreen Trust, in fee.

For further information concerning this action, reference may be made to the records of the Clerk of the Court for the United States District Court for the Eastern District of Pennsylvania, 601 Market Street, Philadelphia, Pennsylvania.

Respectfully submitted,

JACQUELINE C. ROMERO United States Attorney

/s/ Sarah Grieb

SARAH L. GRIEB LESLEY S. BONNEY MEAGHAN A. FLANNERY KEVIN L. JAYNE Assistant United States Attorneys

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COLIN TRUNDLE
Trial Attorney
Money Laundering & Forfeiture Unit
Money Laundering & Asset Recovery
Section
U.S. Department of Justice
Washington, D.C.

Dated: <u>January 31, 2023</u>

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the Amended Lis Pendens has been served on this date, by electronic filing upon the counsel of record.

/s/ Sarah Grieb

SARAH L. GRIEB Assistant United States Attorney Chief, Asset Recovery and Financial Litigation

Date: January 31, 2023